

From: [Kennedy, Aisha](#)
To: [Adams, Darla](#)
Cc: [Harley, Dorothy](#); [Schofield, John](#)
Subject: Response Requested by 9/26/16: Clarify Rho-Chem's Response to EPA Region 9's 3007 Letter
Date: Tuesday, September 06, 2016 4:36:00 PM

Darla,

This email seeks clarification of Rho-Chem's response to EPA Region 9's 3007(a) Request for Information letter received by Rho-Chem on February 24, 2016.

1. RE: Item 1. To date, Rho-Chem has provided EPA with 48 packets of macroencapsulation and microencapsulation manifest/process documents.

a. Confirm that the Waste Process Form provided for each outgoing manifest load represents the entire load of waste shipped off-site.

b. Confirm that the term "stabilization" as used in the response documents means microencapsulation per 40 CFR § 268.45. Some of the response information does not specifically state microencapsulation in the manifest packet summary tables provided to EPA Region 9.

c. For your information, the July 24, 2016 manifest packet submissions contained 3 duplicate packets from prior packet submissions.

d. EPA Region 9 estimates that the agency will be receiving a total of 228 packets from Rho-Chem. Provide a specific date by which the remaining 180 packets will be submitted to EPA.

2. RE: Item 5. EPA requested an inventory of the amount and type of solvent Tanks 50-54 contained at the time of the inspection. Rho-Chem did not provide the requested inventory. EPA Region 9 again requests that Rho-Chem provide EPA with an inventory of the type and amount of solvent contained in each of the tanks prior to the time each tank was emptied and cleaned.

3. RE: Item 9. Rho-Chem stated in its' March 24, 2016 response that the facility needed to know which containers EPA was referring to in order to completely answer the question. The attached photographs are three of the containers Region 9 is referring to in EPA's Request for information letter.

4. RE: Item 11. Rho-Chem's responses to EPA Region 9's questions are vague. Provide additional detail to the following items:

a. Rho-Chem states that the reason why the pipe was removed was because it was not

necessary. Provide a detailed written response as to why the pipe was not necessary.

b. EPA requested information regarding the purpose of the pipe. Rho-Chem stated that “The purpose of the pipe was to convey vapors to the vapor control system knockout pot.” Provide the exact sources of all vapors that were being transferred by the pipe to the knock-out pot.

c. Provide a detailed description and location of the knock-out pot referred to above.

d. Provide an explanation of the effect of having an open pipe on the facility’s vapor recovery system?


e. Provide a detailed, well labeled, flow diagram of the facility’s vapor recovery system.

5. After reviewing Rho-Chem’s response, EPA would like additional information concerning the waste reclamation units (e.g., batch distillation), air pollution control equipment. Specifically, EPA Region 9 would like Rho Chem to provide copies of its signed and dated certification statements found at 40 CFR §§ 264.1035(b)(4)(iv); 264.1035(b)(4)(v).

EPA Region 9 requests Rho-Chem provide a response to this e-mail by Monday, September 26, 2016.

If you have any questions concerning the above, please do not hesitate to contact me.

Regards,

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